

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

DEPO. R. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

ANGELA DENISE NAILS,

Plaintiff,

Case No. 1:07CV 0006-WKW

JENIFER FEAGER,

Defendant,

COMPLAINT OF NEGLIGENCE

*The case follows under the jurisdiction Article III Section 2a
Constitutional law. Subject matter question controversy of
\$1,000.000.000.000.00 one billion dollars. The plaintiff and the
defendant are both united states citizens and both live in the same state
FRCP Rule 28 U.S.C. 1331(a)(2) A substantial part of the events arose in
the claim.*

*The plaintiff and the defendant are not in agreement of the plaintiff rights
to privacy. The defendant Jennifer Feager who is hired by DSI address is*

at 600 West Adams Street Dothan, Alabama 36303. Which is also the defendant mailing address.

The defendant who works for DSI. DSI has place the defendant at Vaughn Tower Apartments at 342 South Saint Andrews Street. The defendant is a Security Guard inside a 8-floor story apartment building for those people who are mostly elderly and handicap. The defendant has made two statements to the plaintiff in the month of October 2006. One statement about locking the lobby doors behind the plaintiff and the Second statement the plaintiff getting out of the laundry room. The laundry room is on the inside of the Vaughn Tower Apartment building. The laundry room closes at 9:00 pm Sunday there Saturday.

The plaintiff was walking out the building doors after the doors were locked. The doors to the building are locked each night at 8:00pm after the doors are locked the tenants living in the building must use there key to lock the doors behind them as they leave to go outside the door. The defendant made the remark to the plaintiff loudly and nasty to lock the door behind the plaintiff. The plaintiff has been living at Vaughn Towers Apartment building for 13 months the plaintiff knows what time the doors to the lobby are locked

in the evening and the plaintiff knows to lock the doors behind the plaintiff when leaving outside of the building.

The defendant came up to the 8th floor laundry room the same floor which the plaintiff lives ask the plaintiff if the plaintiff cloths were about finish and it is 8:55pm. the plaintiff ask the defendant what time it was the defendant stated 8:55pm. The plaintiff stated she would be out of the laundry room before 9:00pm.

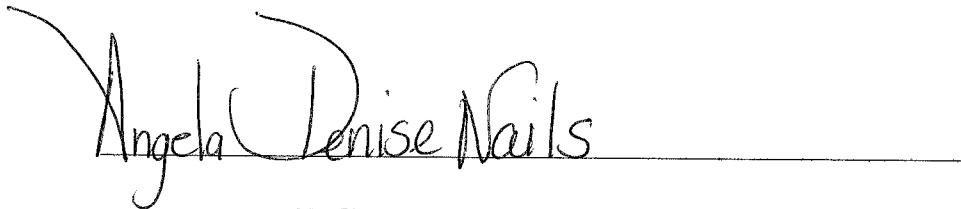
PROFESSIONAL CONDUCT FRCP RULE 1.16 the defendant on September 25, 2006 sat at the security desk that is provided for the DSI worker to sit at while working. The desk is on the first floor which is the lobby of the apartment building. The night of September 25, 2006 at about 7:15pm one of the tenants living inside the building attacked the plaintiff. The defendant sat at the security desk and watch the attack go on. The plaintiff moved away from the person who was assaulting the plaintiff the plaintiff screamed for the defendant to call the police. The defendant stated that she did not have a phone. The defendant had a telephone sitting on top of the desk. One of the visitors on the inside of the building was talking to others who were also on the inside of the building and the visitors were

future down toward the elevator doors on the inside of the building. The visitor came from the other side of the lobby and contacted the Dothan Police Department. The visitor heard the scream form the plaintiff.

The defendant told the police officers that she saw the plaintiff slap the assaulter out of a chair that was sitting in the lobby of the apartment building. The defendant told that the plaintiff assaulted the person because the person would not let plaintiff sit in the chair after the plaintiff ask the assaulter to get up out of the chair. There was not any chair in the lobby of the first floor of the building. Not until after the assault happen to the plaintiff. After the plaintiff was assaulted the management of the building put two wing back chairs in the lobby.

The plaintiff contacted the Mastirates Office in Dothan, Alabama on December 14, 2006 and spoke with the Mastriates Office about the warrant the plaintiff swore out against the assaulter on October 5, 2006. The Mastriates Office told the plaintiff that the assaulter plead guilty to assaulting the plaintiff on October 31, 2006. The plaintiff was told that the assaulter would have to pay restitution.

The defendant knowly gave false information to the authorities (DOTHAN POLICE DEPARTMENT) and false information was given to the apartment building manager that the plaintiff resides at. Because of the false information the defendant gave to the Dothan Police Department the manager supervisor has written a eviction notice to the plaintiff asking the plaintiff to move form the apartment the plaintiff has been living in for 13 months. The management office has refused to accept the plaintiff rent due the sworn statement of the assaulted and the defendant false statements to the Dothan Police Department in Dothan, Alabama 36303.



Angela Denise Nails

ANGELA DENISE NAILS

PRO SE ATTORNEY